



U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 2

Emergency and Remedial Response Division

290 Broadway, 19th Floor

New York, New York 10007-1866

By Email

August 17, 2015

Ms. Suzy Walls
ARCADIS U.S., Inc.
114 Lovell Road, Suite 202
Knoxville, TN, 37934

RE: Comments on Addendum 1 to the Data Gaps Sampling and Analysis Plan and the Addendum 1 to the Quality Assurance Project Plan for the Data Gaps Sampling and Analysis Plan, dated April 2015, Rolling Knolls Landfill Superfund Site, Chatham, New Jersey

Dear Ms. Walls:

The U.S. Environmental Protection Agency (EPA) has completed its review and is providing comments on Addendum 1 to the Data Gaps Sampling and Analysis Plan (SAP) and the Addendum 1 to the Quality Assurance Project Plan for the Data Gaps Sampling and Analysis Plan, dated April 2015 prepared by ARCADIS U.S., Inc. on behalf of Chevron Environmental Management Company, Lucent Technologies Inc., (now known as Alcatel-Lucent USA Inc.) and Novartis Pharmaceuticals Corporation (the Group) for the Rolling Knolls Landfill Superfund Site, located in Chatham, New Jersey. This document has also been reviewed by the New Jersey Department of Environmental Protection (NJDEP). All comments have been collated as appropriate and attached.

This review provides additional comments to ARCADIS revised list of samples/locations submitted on August 4, 2015 in response to EPA's comments submitted on June 17, 2015, primarily Table 1, Sample Locations, Depths and Analyses.

EPA disapproves the revised Table 1 as part of Addendum 1 to the Data Gaps SAP and QAPP as submitted, and requires the Group to amend the document in accordance with the attached comments. A revised Addendum 1 to the Data Gaps SAP and QAPP must be submitted within ten (10) days of your receipt of this letter. All of the enclosed comments must be addressed including EPA's comments previously provided on June 17, 2015. If all comments are not adequately addressed, EPA may exercise its right to modify the document and provide the revised document to you for implementation or to direct you to make specified modifications to the document.

If you believe that any changes are necessary other than those directed by EPA's enclosed comments, those changes must be discussed with, and approved by, EPA's Project Coordinator prior to re-submittal of the document. Those discussions may be memorialized in a progress report or other communication to EPA's Project Coordinator. In addition, all changes made to the document, other than those made specifically at the direction of EPA, must be specified in writing to EPA upon re-submittal of the document.

Sincerely yours,

Tanya Mitchell

Tanya Mitchell
Special Projects Branch
Remedial Project Manager

cc: J. McKenzie, NJDEP

**EPA's Comments on ARCADIS Revised Samples/Locations Submitted on August 4, 2015
for Addendum 1 to the Data Gaps
Sampling and Analysis Plan and the Quality Assurance Project Plan dated April 2015
Rolling Knolls Landfill Superfund Site, Chatham, New Jersey**

General Comments

- 1) ARCADIS has referenced the presence of Diffuse Anthropogenic Pollutants (DAP) as a justification for not delineating PAH contamination in the northern area of the site. Prior to entertaining any technical argument based on the presence of DAP, provide the levels of DAP found in the background investigation to support the justification that the levels of DAP at the site would not require further delineation. Until such documentation is presented, please remove reference from Table.
- 2) The limited elevation data associated with the map contours that were provided to NJDEP is problematic. Without more detailed contour information it is difficult, if not impossible, to accurately interpret sample elevations across many areas of the site. As this information will be especially critical when completing the delineation of contaminants associated with the site, NJDEP is requesting that all new sample locations be surveyed, as is required in N.J.A.C. 7:26 E (Tech Regs). This is a standard requirement when collecting soil data for sites at which the NJDEP's Site Remediation Program is involved. Be advised that NJDEP is not requesting that previous sample locations be surveyed, but that all future locations be properly surveyed.
3. Although it was not discussed in the spreadsheet that was included in the August 3, 2015, soil sampling proposal, NJDEP would like to clarify the intervals to be sampled at each boring location. As discussed in its June 11, 2015 letter to EPA, during the June 30, 2015 conference call, and as modified here, NJDEP requests that the following intervals be sampled for analysis:

The Perimeter borings (DEP Samples #2 through #28) should be advanced at the marked locations beyond the landfilled boundaries. These perimeter boring samples should be collected from the 0 - 1 foot surface interval for non-VOC parameters and the 6"-12" inch interval below grade interval for VOC parameters. Additional samples should be collected at these perimeter locations at the 1 - 2 foot interval below grade for non-VOC parameters and the 12" - 18" inch interval below grade for VOC parameters. Please note that this deeper sampled interval represents a modified depth from the 2 ½ to 3 foot interval which was initially requested in our June 11, 2015 correspondence to EPA. It is anticipated that this modification will leave less delineation issues open that will need to be addressed during the pre-design phase.

The Interior Landfill borings (DEP Samples #29 through #35) should be advanced within the landfilled boundaries (as represented on Figures 3A and 3B) with soil samples collected from the 0 - 1 foot interval immediately beneath the bottom of the landfilled materials to characterize and delineate the contamination associated with the waste. At these same locations, soil samples should also be collected from a 1 foot core collected just above the underlying clay layer to vertically delineate soil contamination within the landfill boundaries. If the responsible party wishes to collect the deeper soil samples in each boring at a depth shallower than the top of the clay layer rather than go directly to the clay layer, NJDEP has no objections; however, the vertical limit of contamination to the appropriate standard must be documented with soil sample results below the applicable NJ-SRS. Each 1 foot sample in these borings should be analyzed for

non-VOC parameters. A 6 inch section of each 1 foot core in these borings should be collected for VOC parameters as needed. The allowance of a 1 foot sampled interval for the non-VOC parameters that was discussed during the June 2015 conference call is being applied here to the Interior Landfilled borings as well as the perimeter borings.

ARCADIS Revised Samples/Locations, 1) Table 1, Sampling Locations, Depths, and Analyses, Addendum 1 Data Gaps Sampling and Analysis Plan
Specific Comments:

1. NJDEP Sample #1: OK. ARCADIS proposes to eliminate this boring. This is acceptable.
2. NJDEP Sample #2: NOT ACCEPTABLE. ARCADIS proposes to eliminate this boring. ARCADIS has not provided the necessary background information to claim that the PAH contamination identified in the area of the ball field (SS-03, SS-09 and SS-10) is due to DAP. As this area is considered part of the “site” being investigated, delineation of the PAH contamination is required at the requested location.
3. NJDEP Sample #3: OK. ARCADIS proposes to move this boring 110 feet to the Southwest of its originally requested location. This is acceptable.
4. NJDEP Sample #4: OK. ARCADIS proposes to collect this boring in the requested location.
5. NJDEP Sample #5: NOT ACCEPTABLE. ARCADIS proposes to move this boring out of the topographic low spot to a low spot in along an elevated ridge.

Based on the limited data currently available to NJDEP, it is not apparent that the modified location would be at the topographic low spot in relation to the landfilled areas. We request that Sample #5 be collected at its originally requested location.

6. NJ DEP Sample #6: CONDITIONALLY ACCEPTABLE. ARCADIS proposes to move this boring from the requested location to a low spot along an elevated ridge.

While it is not completely evident to NJDEP (based on the elevation contours associated with Figure 3A), EPA has indicated that it has field- verified the relative elevation of the modified location and finds it an acceptable alternate location. The NJDEP defers to EPA’s field reconnaissance in regard to this boring.

7. NJ DEP Sample #7: OK. ARCADIS proposes to collect this boring in the requested location.
8. NJDEP Sample #8: OK. ARCADIS proposes to collect this boring in the requested location.
9. NJDEP Sample #9: OK. ARCADIS proposes to collect this boring in the requested location.
10. NJDEP Sample #10: OK. ARCADIS proposes to move this boring to be 100 feet east of SS-134. This is acceptable.

11. NJ DEP Sample #11: OK. ARCADIS proposes to eliminate this boring due to its interpretation that horizontal delineation is complete at SS-138. This is acceptable as the PCB Congeners identified in SS-138 will be addressed in future ecologic evaluations.

12. NJDEP Sample #12: OK. ARCADIS proposes to collect this boring in the requested location.

13. NJDEP Sample #13: OK. ARCADIS proposes to collect this boring in the requested location.

14. NJDEP Sample #14: OK. ARCADIS proposes to collect this boring in the requested location.

15. NJ DEP Sample #15: OK. ARCADIS proposes to eliminate this boring based on the results of SS-116. This is acceptable.

16. NJ DEP Sample #16: OK. ARCADIS proposes to collect this boring in the requested location.

17. NJDEP Sample #17: OK. ARCADIS proposes to move this boring closer to the edge of the landfilled area. This is acceptable.

18. NJDEP Sample #18: OK. ARCADIS proposes to move this boring closer to the edge of the landfilled area. This is acceptable.

19. NJDEP Sample #19: OK. ARCADIS proposes to move this boring closer to the edge of the landfilled area. This is acceptable.

20. NJDEP Sample #20: OK. ARCADIS proposes to eliminate this boring as there is already a proposed soil/sediment sample (SS-169) in the general vicinity of this location. It is also noted by the NJDEP that proposed boring SS-165 will provide additional information west of the originally requested location of #20. This is acceptable.

21. NJDEP Sample #21: OK. ARCADIS proposes to eliminate this boring as there are already EPA requested samples (SS-168 and SW/SE-34) in the general vicinity of this boring location. This is acceptable.

22. NJDEP Sample #22: NOT ACCEPTABLE. ARCADIS proposes to move #22 closer to the western edge of the landfilled area.

This is not acceptable as the revised location appears to be located at a slight topographic high relative to the surrounding surface. It is requested that the boring be advanced in the originally requested location, or at least west of the high spot on which it was proposed.

23. NJDEP Sample #23: OK. ARCADIS proposes to collect this boring in the requested location.

24. NJDEP Sample #24: OK. ARCADIS has proposed to eliminate this boring based on the presence of topographic features that would prevent runoff from the site from affecting this location and access concerns. CERCLA provides authorization for sample collection on properties that are associated with a human health or ecological risk. Please remove reference to not having legal access to collect the sample.

Based on a closer inspection of the contours in the vicinity of this location, this is acceptable for this phase of the investigation. The need for a boring in this location will be re-assessed once the data from NJDEP Sample #25 is evaluated.

25. NJDEP Sample #25: NOT ACCEPTABLE. ARCADIS proposes to move this boring approximately 400 feet to the Southeast of its original location. As it is not apparent how it was determined that the alternate location of #25 is at the outlet of the surface water body which straddles the northern perimeter of the landfilled area, the NJDEP requests that this boring be advanced in its original location.

26. NJDEP Sample #26: CONDITIONALLY ACCEPTABLE. ARCADIS proposes to eliminate this boring. This is conditionally acceptable providing that #25 is advanced in its originally requested location.

27. NJDEP Sample #27: NOT ACCEPTABLE. ARCADIS proposes to eliminate this boring. ARCADIS has not provided the necessary background information to claim that the PAH contamination identified in the area of the ball field (SS-03, SS-09 and SS-10) is due to DAP. As this area is considered part of the “site” being investigated, delineation of the PAH contamination is required at a location north of the ball field area. EPA suggests this location be moved about 135 feet southeast (to headwater of stream/drainage that empties at NJDEP Sample #1).

28. NJDEP Sample #28: OK. ARCADIS proposes to collect this boring in the requested location.

29. NJDEP Sample #29: OK. ARCADIS proposes to collect this boring in the requested location.

30. NJDEP Sample #30: OK. ARCADIS proposes to collect this boring in the requested location.

31. NJDEP Sample #31: OK. ARCADIS proposes to collect this boring in the requested location.

32. NJDEP Sample #32: OK. ARCADIS proposes to collect this boring in the requested location.

33. NJDEP Sample #33: OK. ARCADIS proposes to collect this boring in the requested location.

34. NJDEP Sample #34: OK. ARCADIS proposes to collect this boring in the requested location.

35. NJDEP Sample #35: OK. ARCADIS proposes to collect this boring in the requested location.

Figures

1) Figure 3a

For SS-165, Figure 3a please relocate the sample location to Figure 3b, as appropriate.